

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA

**FILED**

OCT 22 2014

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

MICHAEL DEAN BILLINGS,

Defendant.

CARMELITA REEDER SHINN, CLERK  
U.S. DIST. COURT, WESTERN DIST. OKLA.  
BY *[Signature]* DEPUTY

No. CR 14-306 M

Violations: 18 U.S.C. § 1594  
18 U.S.C. § 2423(e)

**INDICTMENT**

The Grand Jury charges:

**COUNT 1**  
**(Conspiracy to Commit Sex Trafficking of Children)**

Beginning on or about February 2, 2003, and continuing to in or about September 2013, in the Western District of Oklahoma; Iquitos, Peru; and elsewhere,

-----MICHAEL DEAN BILLINGS,-----

and others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means, individuals both known and unknown to the Grand Jury (collectively, "the Victims"), knowing and in reckless disregard of the fact that force, threats of force, fraud and coercion as defined in Title 18, United States Code, Section 1591(e)(2), or any combination of such means, knowing and in reckless disregard of the fact, and having had a reasonable opportunity to observe the

Victims, that the Victims had not attained the age of 18 years and would be caused to engage in a commercial sex acts, all in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(c).

All in violation of Title 18 United States Code, Section 1594.

**COUNT 2**

**(Conspiracy to Travel with Intent to Engage in Illicit Sexual Conduct)**

Beginning on or about February 2, 2003, and continuing to in or about September 2013, in the Western District of Oklahoma; Iquitos, Peru; and elsewhere,

-----**MICHAEL DEAN BILLINGS,**-----

a citizen of the United States, and others known and unknown to the Grand Jury, combined, conspired, and agreed to travel in foreign commerce, to-wit: from the Will Rogers World Airport in Oklahoma City, Oklahoma, to Iquitos, Peru, for the purpose of engaging in any illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), including a sexual act with persons under 18 years of age, all in violation of Title 18, United States Code, Section 2423(b).

All in violation of Title 18, United States Code, Sections 2423(e).

**COUNT 3**

**(Conspiracy to Engage in Illicit Sexual Conduct in Foreign Places)**

Beginning on or about February 2, 2003, and continuing to in or about September 2013, in the Western District of Oklahoma; Iquitos, Peru; and elsewhere,

-----**MICHAEL DEAN BILLINGS**,-----

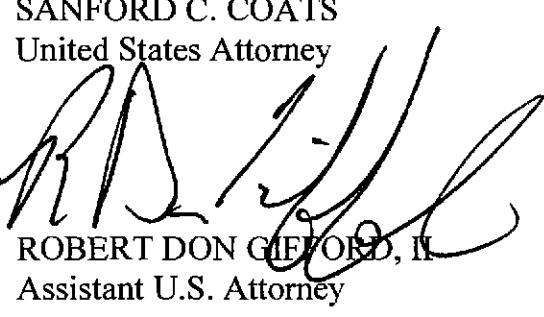
a citizen of the United States, and others known and unknown to the Grand Jury, combined, conspired, and agreed to engage in any illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), including a sexual act with persons under 18 years of age, all in violation of Title 18, United States Code, Section 2423(c).

All in violation of Title 18, United States Code, Sections 2423(e).

TRUE BILL:

*Virginia Glor*  
FOREPERSON OF THE GRAND JURY

SANFORD C. COATS  
United States Attorney

  
ROBERT DON GIFFORD, II  
Assistant U.S. Attorney

DAVID PETERMANN  
Assistant U.S. Attorney